

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

DAEDALUS PRIME LLC,  
*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD., et al  
*Defendants.*

Civil Action No. 2:22-cv-00353-JRG  
(Lead Case)

DAEDALUS PRIME LLC,  
*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD., et al  
*Defendants.*

Civil Action No. 2:22-cv-00354-JRG  
(Member Case)

**JURY TRIAL DEMANDED**

**UNOPPOSED MOTION TO EXTEND THE DEADLINES TO COMPLY WITH  
INFRINGEMENT, INVALIDITY, AND SUBJECT-MATTER ELIGIBILITY  
CONTENTIONS**

Plaintiff Daedalus Prime LLC (“Daedalus”) files this Unopposed Motion to Extend the Deadlines to Comply with Infringement, Invalidity, and Subject-Matter Eligibility Contentions as to each of the consolidated cases: Civil Action No. 2:22-cv-353 and Civil Action No. 2:22-cv-354, and, in support thereof, would respectfully show the Court as follows:

With respect to Cases 2:22cv353 and 2:22cv354, Plaintiff respectfully requests that the Court enter an Order to extend the deadline to comply with P.R. 3-1 and 3-2 (Infringement Contentions) from November 3, 2022 until and including November 17, 2022. Plaintiff also requests that the deadline for Defendants to comply with P.R. 3-3 & 3-4 (Invalidity Contentions) and to comply with the Court’s Standing Order Regarding Subject-Matter Eligibility Contentions

(Subject-Matter Eligibility Contentions) be extended from December 29, 2022 until and including January 26, 2023. These extensions are not sought for the purpose of delay but will allow the parties additional time so that they may fully comply with the disclosure requirements of this Court. Additionally, Defendants' deadline to answer is currently January 3, 2023, and the extensions will ensure that Defendants' invalidity contentions and subject matter eligibility contentions are due after the deadline for answering or otherwise responding.

A proposed order is attached herewith.

Dated: November 2, 2022

Respectfully Submitted,

/s/ Garland Stephens, with permission  
Charles Everingham IV

Garland Stephens

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*Attorneys for Plaintiff Daedalus Prime LLC*

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(i) that the relief requested in this motion is unopposed.

/s/ Charles Everingham IV  
Charles Everingham IV

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 2<sup>nd</sup> day of November, 2022.

/s/ Charles Everingham IV  
Charles Everingham IV